

201-15788



**Annette  
Washington/DC/USEPA/US**

01/25/2005 04:34 PM

To NCIC HPV@EPA, Michael Ofner/DC/USEPA/US@EPA  
cc  
bcc  
Subject (AR-201) Petroleum HPV Testing Group Update-Consortium Member  
and Sponsored Chemical List HPV Registration (API Letter to EPA Dated  
November 22, 2004)

----- Forwarded by Annette Washington/DC/USEPA/US on 01/25/2005 04:30 PM -----



**Jocelyne Matias  
<matiasj@apiorg>**

01/25/2005 04:02 PM

To Annette Washington/DC/USEPA/US@EPA  
cc Lorraine Twerdok <Twerdokl@api.org>  
Subject RE: Petroleum HPV Testing Group Update-Consortium Member and  
Sponsored Chemical List HPV Registration (API Letter to EPA Dated  
November 22, 2004)

Ms. Washington,

Lorraine Twerdok forwarded your email to me so that we can address the CAS# and sponsor company discrepancies between API and EPA. Please see my comments below in red. In the case of member companies, some of the Petroleum HPV Testing Group's sponsoring companies are wholly owned subsidiaries that operate separately from the parent corporation. Although some companies may have similar names (such as Silver Eagle Refining (UT) and Silver Eagle Refining (WY)), or are under the same parent company (such as PDV Midwest Refining and CITGO Asphalt Refining Company), they have separate contracts with the Testing Group and want recognition for their efforts in the HPV Program. I have indicated these situations in your email below and have requested that these companies remain separately listed on the member company roster.

Please let me know if you have any further questions.

Thanks,

Jocelyne Matias  
Research Associate  
Regulatory Analysis and Scientific Affairs  
American Petroleum Institute  
1220 L Street NW  
Washington DC 20005  
(202) 682-8475 (phone)  
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Dr. Twerdok,

As we reviewed the subject letter, several issues surfaced concerning both chemical commitments and API members.

#### Chemicals

In comparing the list of API-sponsored chemicals and the test plans submitted as of API's November 22, 2004 letter, we note the following:

CAS 8002059 is listed as sponsored, with a start year of 2003, in Crude Oil test plan but no such test plan has been received. - **the Crude Oil test plan was submitted to EPA on 11/24/03 (<http://www.epa.gov/chemrtk/crdoilct/c14858tp.pdf>)**

CAS 64742729 is listed as sponsored in the Gas Oils test plan and a Gas Oils test plan has been submitted but this CAS was not recorded as a test plan chemical. **See attachment 1- Letter to EPA notifying consortium sponsorship of this CAS# in Gas Oils category-this CAS# will be included in the revised Gas Oils test plan, which has not been submitted yet.**

CAS 68333233 is listed as sponsored in the Kerosenes/Jet Fuel test plan and a Kerosenes/Jet Fuel test plan has been submitted but this CAS was not recorded as a test plan chemical. **This CAS# will be included in the revised Kerosenes/Jet Fuel test plan, which has not been submitted to EPA yet.**

CAS 64742241, 64742401, 64743039, 68334010, 68513622, 68815214, 68920649, 68955964, and 68988998 are listed as sponsored in the Reclaimed Substances test plan and a Reclaimed Substances test plan has been submitted but these CAS were not recorded as test plan chemicals. **These CAS#s are included in the Reclaimed Substances II test plan which was submitted on 12/15/03.**

#### Member Companies

There are several cases where we have not adhered to the exact member assignments as provided by API. This is either because we believe we may have more updated information on the member organization or because we are trying to maintain consistency with how one organization appears throughout the HPV Challenge Program documentation. Note that in addition to the membership issues below, we have also made some very minor editorial changes for general consistency (e.g. "Company" instead of "Co.") which we have identified here.

Alcoa Inc. – We propose to use simply Alcoa, to maintain consistency with other HPV Challenge Program activities of the same organization. **This change is acceptable.**

ATOFINA Petrochemicals – On 10/1/04, Total announced a new name of Total Petrochemicals USA, Inc. (<http://www.totalpetrochemicalsusa.com/home/default.htm>) **This change is acceptable.**

BP p.l.c. – We propose to use simply BP, to maintain consistency with other HPV Challenge Program activities of the same organization. **This change is acceptable.**

CITGO Asphalt Refining Company – From a recent contact we made, this company is now part of Citgo Petroleum Corporation and we propose to remove it as a separate sponsoring organization. **CITGO Asphalt Refining Company has a separate contract with the Petroleum HPV Testing Group and operates separately from the parent company, Citgo Petroleum Corporation. Please keep this company listed as a separate sponsoring organization.**

ConocoPhillips – We propose to use ConocoPhillips Company consistent with most recent communications from them. **This change is acceptable.**

Countrymark Refinery – Previously called Countrymark Cooperative, Inc., the most recent company website information seems to indicate a best name of Countrymark Cooperative, LLP. **This change is acceptable.**

Enterprise Products Company – This organization previously committed to the HPV Challenge Program through API. They do not appear on the current member list and it is not clear whether they have dropped any commitment to the program or whether they have been acquired by another company and are fulfilling their commitment through this new organization. **-API will follow up with this company and inform you of the final outcome. Please do not add this company to the member list at this point until we can further review their consortium status.**

Farmland Industries Inc. – Our most recent attempt to contact this organization suggested they are no longer in business but that they are now part of Coffeyville Resources. The contact name is Sam McCormick, address is PO Box 570 Coffeyville, KS 67337-0570, email is [sammccormick@coffeyvillegroup.com](mailto:sammccormick@coffeyvillegroup.com), and phone is 913-982-0457. We are assuming that Coffeyville has assumed the commitments made by Farmland. **API will follow up with this company and inform you of the final outcome. Please keep this company on the member list at this point until we can further review their consortium status.**

Flint Hills Refineries – For standardization across the HPV Challenge Program, we simply identify them with the parent Koch Industries, Inc. **Please keep this on the roster as Flint Hills Refineries, as this is the name that API has on its membership contract with the company.**

Honeywell International - We propose to use Honeywell International Inc., to maintain consistency with other HPV Challenge Program activities of the same organization. **This change is acceptable.**

Marathon Ashland Pipeline, LLC – We propose to continue calling it Marathon Ashland Petroleum LLC. **This change is acceptable.**

Murphy Oil Corporation – We propose to continue calling it Murphy Oil USA, Inc. **This change is acceptable.**

PDV Midwest Refining, L.L.C. - From a recent contact we made, this company is now part of Citgo Petroleum Corporation and we propose to remove it as a separate sponsoring organization. **PDV Midwest Refining, L.L.C. has a separate contract with the Petroleum HPV Testing Group and operates separately from the parent company, Citgo Petroleum Corporation. Please keep this company listed as a separate sponsoring organization.**

Premcor Refining Group Inc. (TN) ; The Premcor Refining Group Inc. (CT) – We propose to have just one name for both, Premcor Refining Group Inc., consistent with the name that appears on their web site. **These two companies have separate membership contracts with the Petroleum HPV Testing Group in order to be recognized as different entities. Please keep these two companies listed separately on the membership list.**

Silver Eagle Refining, Inc. (UT) ; Silver Eagle Refining, Inc. (WY) – We propose to have just one name for both, Silver Eagle Refining, Inc., consistent with how they have appeared in the past. **These two companies have separate membership contracts with the Petroleum Testing Group in order to be recognized as different entities. Please keep these two companies listed separately on the membership list.**

Specified Fuels & Chemicals, LLC – This organization, now called Dow Haltermann Houston (1201 Sheldon Road PO Box 429 Channelview, TX 77530-0429), has claimed to be a member of API but is not recognized on API's member list. Our most recent contact here is Gary Spaid/Jeff Jack, (glspaid@dow.com) at 832-376-2352. What is API's position regarding Dow's membership? **API will follow up with this company and inform you of the final outcome. Please do not add this company to the member list at this point until we can further review their consortium status.**

Tesoro Petroleum Corporation – We propose to use the name as it appears on their web site ( [http://www.tsocorp.com/stellent/groups/public/documents/published/tsi\\_internethome.hcsp](http://www.tsocorp.com/stellent/groups/public/documents/published/tsi_internethome.hcsp)), Tesoro Corporation. **This change is acceptable.**

Unocal International Supply and Trading Co. – We propose to continue calling it Unocal Corporation. **This change is acceptable.**

We welcome your feedback any of these issues.

Annette Washington

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# Petroleum HPV

July 29, 2004

Administrator  
US Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attention: Chemical Right-to-Know Program

**Submitted via email to:**

[oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov) and  
[chem.rtk@epa.gov](mailto:chem.rtk@epa.gov)

RE: **American Petroleum Institute Petroleum HPV Testing Group  
Consortium #**

On behalf of the API Petroleum HPV Testing Group, a consortium of companies, API is pleased to provide this letter of commitment for voluntary testing of an additional petroleum chemical substance. The substance, which is identified by CASRN 64742-72-9 and chemical name *Distillates, petroleum, catalytic dewaxed, middle*, is in addition to the substances sponsored by API on March 15, 1999, October 28, 1999, November 29, 1999 and December 1, 1999.

This substance will be integrated into the Gas Oils Category Test Plan, which is one of the existing 13 categories sponsored by the API on behalf of the Testing Group

In return, the API Petroleum HPV Testing Group expects the chemical will **not** be included in any future HPV orphan test rules.

Please do not hesitate to contact me (202-682-8344; [twerdokl@api.org](mailto:twerdokl@api.org)) or Mr. Thomas M. Gray (202) 682-8480; [grayt@api.org](mailto:grayt@api.org) if you or your staff have questions or comments about the API Petroleum HPV Testing Group.

Best regards,

Lorraine E. Twerdok, Ph.D., D.A.B.T.  
Administrator  
API Petroleum HPV Testing Group

Cc: O. Hernandez, EPA  
(Via email) R. Northrup, EPA  
Members of API Petroleum HPV Testing Group

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